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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

Sixth Further Notice Of Proposed Rule Making

By: Apple Valley Television Association Inc.

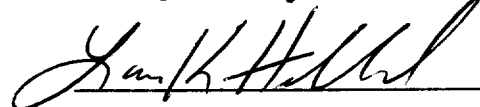
P.O. Box 582

(509) 662-0882

Wenatchee, Washington 98807-0582

1. We have a need for you to hear our voice. We are a TRANSLATOR and LOW POWER Television Association. We are non-profit. We are owned by the public. We serve THREE WASHINGTON COUNTIES. This proposed docket will displace most if not all our services.
2. All data enclosed will be the results if this docket passes. WE DISAGREE WITH DOCKET 87-268.

Respectfully submitted,



No. of Copies rec'd 0
List ABCDE

Lonnie K. Hubbard - General Manager
By: 11/19/96

ORIGINAL

PETITION AGAINST DOCKET 87-268

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

re: MM Docket No. 87-268

October 29, 1996

We the undersigned are AGAINST the proposed Docket No. 87-268, Sixth Further Notice Of Proposed Rule Making. We request that you further RECONSIDER and RECOGNIZE TRANSLATOR and LOW POWER OPERATIONS as a whole.

By using the NEW Proposed DTV Technical Standards, Chelan and Douglas counties will suffer UNACCEPTABLE losses for RURAL TELEVISION. We represent SIXTY THREE Translator or Low Power stations in these two counties. Twenty-nine of the above stations which represents 46% would immediately be displaced due to auction, allotment or new technical standards. The majority of the 29 stations represents stations at PRIMARY SITES which feed SECONDARY SITES. Of the remaining 34 stations, 25 would have NO INPUT due to displacement of the PRIMARY SITES. These losses are unacceptable. SEE EXHIBIT ONE.

I must emphasize that due to our terrain, our current way of delivery is the only way of delivery of local and regional networks. Please see EXHIBIT TWO. PATH PROFILES.

I must emphasize that ALL these stations are owned by NON-PROFIT local Television Associations which are owned by THE PEOPLE we serve. These Associations are supported by DONATION and could not survive the financial burdens that are being proposed unless the FCC proposes FINANCIAL GRANTS for rural communities showing hardship.

In areas with NATURAL TERRAIN SHIELDING, like ours, it is impossible to receive television direct from Spokane Washington, Yakima Washington, or Seattle Washington. TRANSLATORS and LOW POWER TELEVISION are a everyday part of life and the only way we can be informed. There are 1921 LOW POWER stations in the USA as of August 31, 1996: 4943 TRANSLATORS, and only 1550 Full Service Stations. SEE EXHIBIT THREE. Who is the MAJORITY in this issue? LOW POWER and TRANSLATORS. We all have to work together. Without each other as a team, neither will survive.

CERTIFICATION:

We the following citizens of the State of Washington, United States of America, certify that the statements in this PETITION are true, complete and correct to the best of our knowledge and belief, and are made in good faith.

DRUG CERTIFICATION:

Neither the applicants nor any party to this PETITION is subject to a denial of Federal Benefits that includes FCC Benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

I certify that the statements in this PETITION are true,
complete and correct to the best of my knowledge and belief,
and are made in good faith.

Sincerely

x Henry M. Galbraith
Henry M. Galbraith
print

Apple Valley TV Assn. Inc.
205 First Street
Wenatchee, WA. 98801
(509) 662-0882

Sincerely

x W.D. Prati
W.D. Prati
print

Upper Valley TV Assn. Inc.
P.O. Box 253
Cashmere, WA. 98815
(509) 782-4384

Sincerely

x Roxie Asher
Roxie Asher
print

Entiat TV Assn. Inc.
4491 Entiat River Rd
Entiat, WA. 98822
(509) 784-1203

Sincerely

x A. Scott Logan
A. Scott Logan
print

Douglas County TV Dist.
c/o HCR Box 53F
Orondo, WA. 98843
(509) 784-1063

x Lyle C Sears
Lyle C SEARS
print

phone: 509 663-1550

x Thomas W. Sears
THOMAS W. SEARS
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x Richard J Ramm
Richard J Ramm
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509
phone: 745-8352

x Otto Adams
OTTO ADAMS
print

phone: 509-7822187

EXHIBIT ONE

LOCATION: MISSION RIDGE (PRIMARY)

CH: COMMENTS:

18 DISPLACED BY ALLOTMENT KCPQ 13/18 <152 MILES
45 OK
63 DISPLACED BY AUCTION
65 DISPLACED BY AUCTION
67 DISPLACED BY AUCTION
69 DISPLACED BY AUCTION

LOCATION: JUMPOFF RIDGE PRIMARY/SECONDARY

49 DISPLACED BY ALLOTMENT (56)
51 DISPLACED BY ALLOTMENT (56)
53 DISPLACED BY ALLOTMENT (56)
55 DISPLACED BY ALLOTMENT (56) AND SPOKANE 55
59 DISPLACED BY ALLOTMENT (56)
61 DISPLACED BY AUCTION AND ALLOTMENT (56)
09 DISPLACED BY ALLOTMENT (09) RICHLAND <152 MLS
11 OK
13 OK

LOCATION: 205 FIRST STREET PRIMARY

47 OK BUT WOULD NEED TO USE CH.56 ALLOTMENT

LOCATION: BADGER MOUNTAIN SECONDARY

08 OK
10 OFF THE AIR, WOULD HAVE NO INPUT (63)
12 OFF THE AIR, WOULD HAVE NO INPUT (65)
14 DISPLACED BY KSTW 11/14 ALLOTMENT <152 MILES
57 DISPLACED BY LOCAL ALLOTMENT (56)

LOCATION: CASHMERE SECONDARY

07 OFF THE AIR, WOULD HAVE NO INPUT (49)
09 DISPLACED BY RICHLAND (09) <152 MILES
11 OFF THE AIR, WOULD HAVE NO INPUT (53)
13 OFF THE AIR, WOULD HAVE NO INPUT (55)
40 OFF THE AIR, WOULD HAVE NO INPUT (57)
49 DISPLACED BY ALLOTMENT
51 DISPLACED BY ALLOTMENT
53 DISPLACED BY ALLOTMENT
55 DISPLACED BY ALLOTMENT
59 DISPLACED BY ALLOTMENT
61 DISPLACED BY ALLOTMENT

EXHIBIT ONE: CONTINUED

LOCATION: MOSES STOOL WATERVILLE SECONDARY

CH:

COMMENTS:

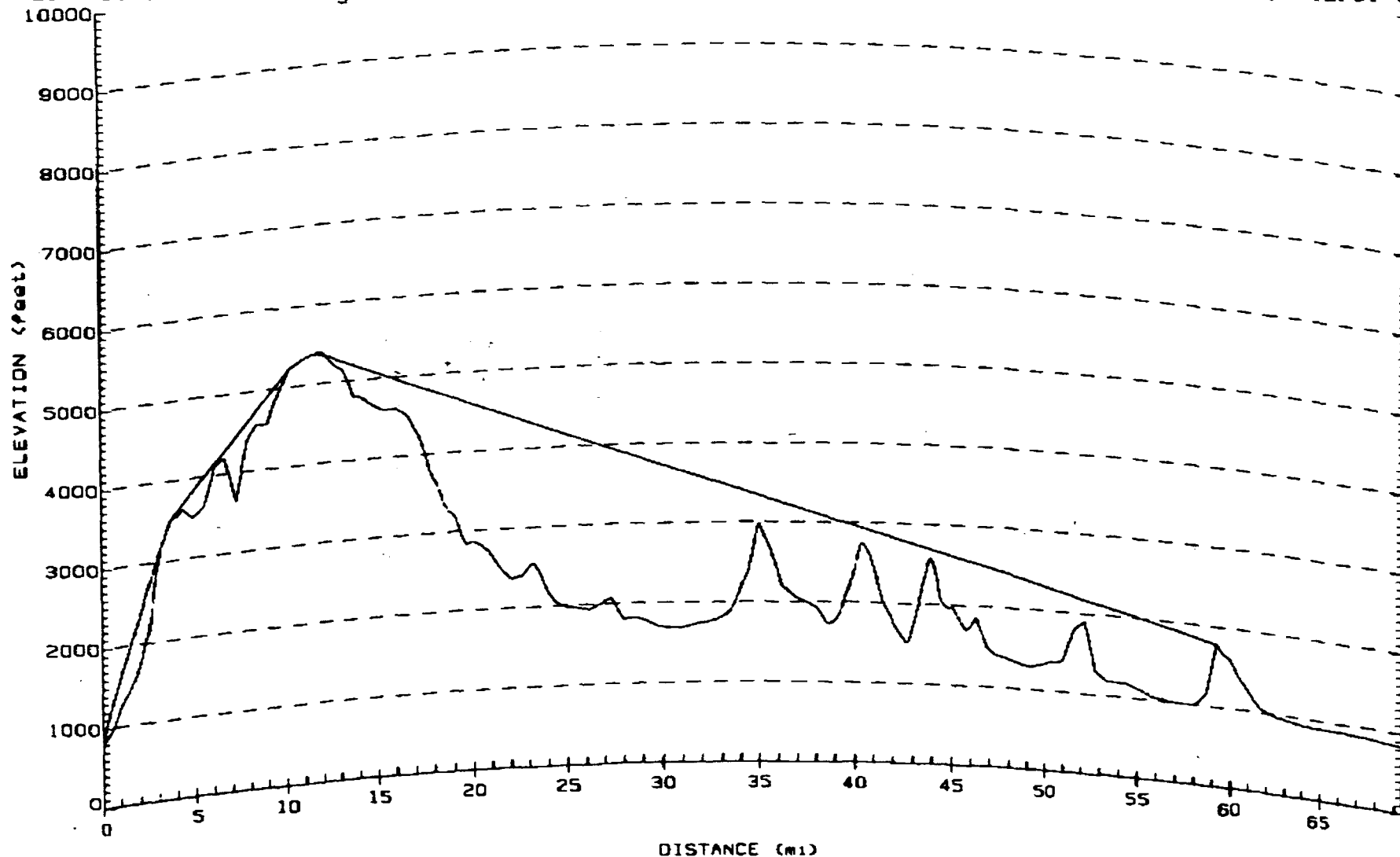
09 DISPLACED BY RICHLAND 09 <152 MILES
11 OFF THE AIR, WOULD HAVE NO INPUT (04/63)
13 OFF THE AIR, WOULD HAVE NO INPUT (06/65)

*****END*****END*****END*****END*****END*****END*****END*****

Site: WENATCHEE CH 47
 N 47 22 10 W 120 13 30
 Ant. Elev. (AMSL): 889.0 ft
 Path azimuth: 193.16 degs.

Frequency: 700.0 MHz
 Path Length: 59.3 mi
 Total Path Loss: 226.5 dB
 Excess Path Loss: 97.6 dB

Site: KYVE, YAKIMA, WA
 N 46 23 30 W 120 33 22
 Ant. Elev. (AMSL): 1782.2 ft
 Path azimuth: 12.91 degs.



K factor: 1.330

30 Second Database
 Rain loss: .0 dB
 Urban loss: .0 dB
 Foliage loss: .0 dB

B. V. St. Clair
 Engineering Consultant

2355 Ranch Drive
 Westminster, CO 80234
 303-465-5742

Path Profile

END PT 46-31-58, 120-30-33

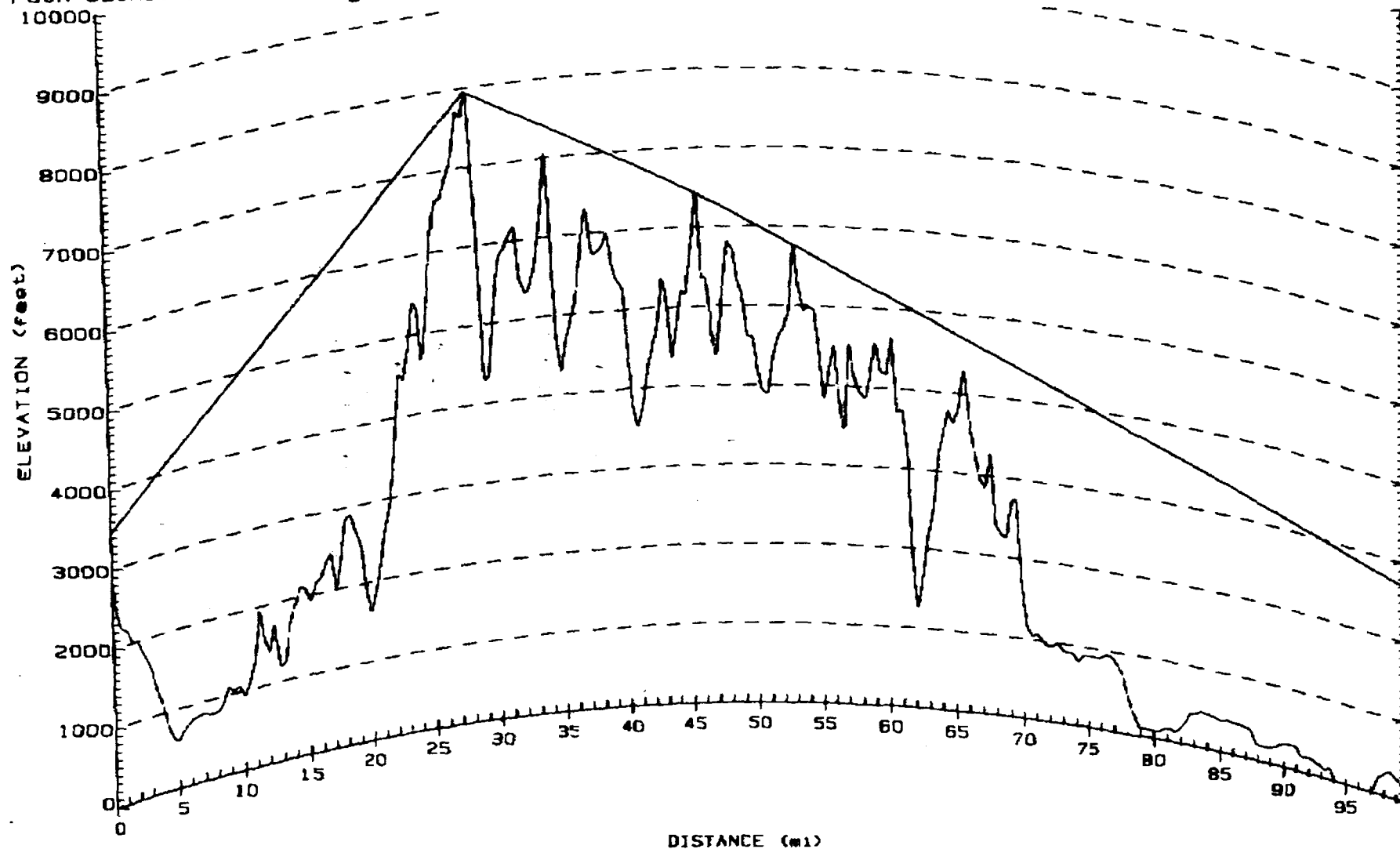
MARCH 27, 1994

Figure 1

Site: BADGER, WA.
N 47 27 50 W 120 12 40
Ant. Elev. (AMSL): 3448.1 ft
Path azimuth: 276.55 degs.

Frequency: 700.0 MHz
Path Length: 99.7 mi
Total Path Loss: 188.0 dB
Excess Path Loss: 54.6 dB

Site: SEATTLE, WA
N 47 36 32 W 122 20 12
Ant. Elev. (AMSL): 2707.4 ft
Path azimuth: 94.99 degs.



K Factor: 1.330

3D Second Database

Rain loss: .0 dB

Urban loss: .0 dB

Foliage loss: .0 dB

B. W. St. Clair
Engineering Consultant

2355 Ranch Drive
Westminster, CO 80234
303-465-5742

Path Profile

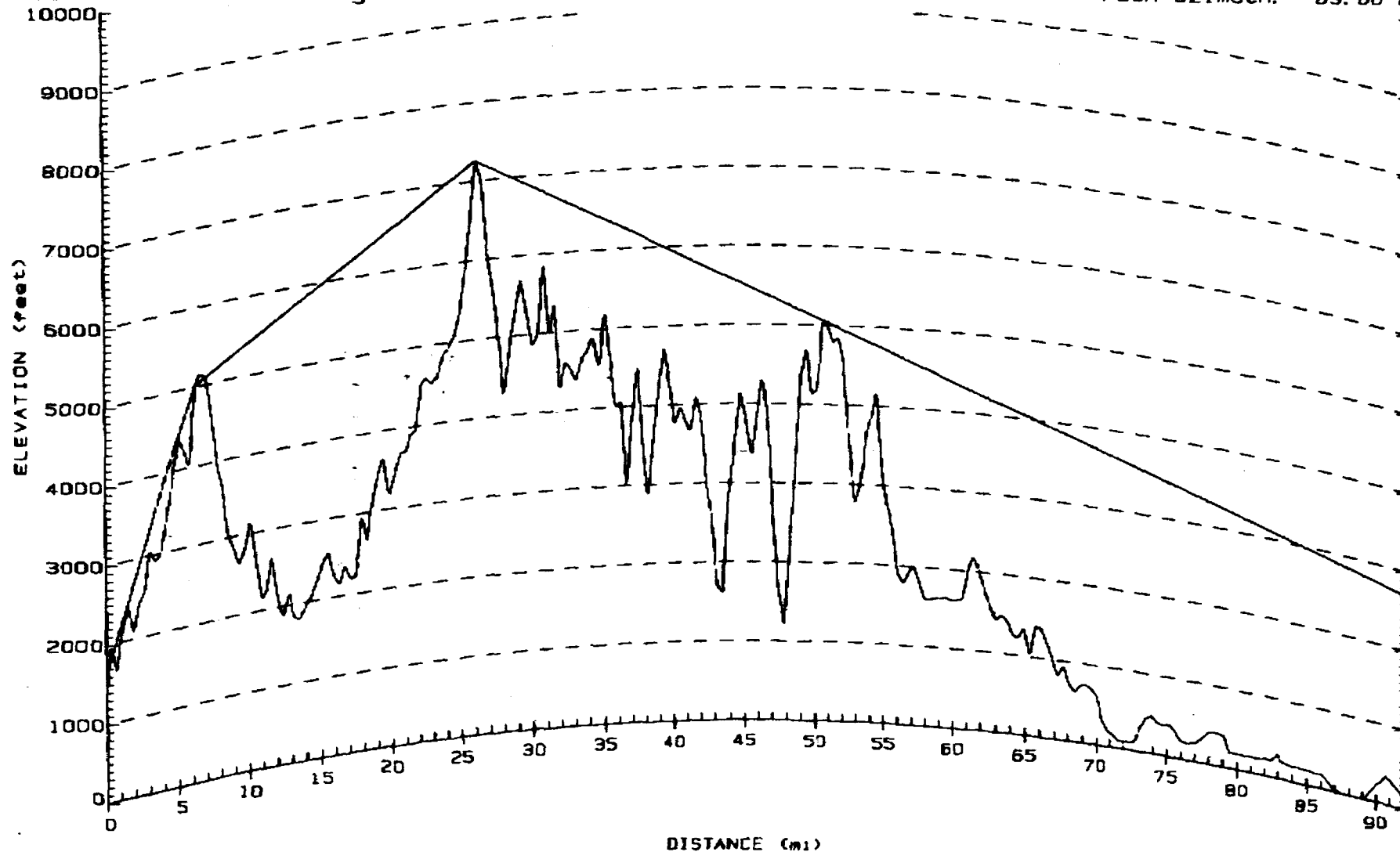
MARCH 27, 1994

Figure 1

Site: ARDENVOIR, WA
N 47 44 26 W 120 22 5
Ant. Elev. (AMSL): 1463.1 ft
Path azimuth: 265.06 degs.

Frequency: 700.0 MHz
Path Length: 92.0 mi
Total Path Loss: 254.3 dB
Excess Path Loss: 121.5 dB

Site: SEATTLE, WA
N 47 36 32 W 122 20 12
Ant. Elev. (AMSL): 2707.4 ft
Path azimuth: 83.60 degs.



K factor: 1.330

30 Second Database

Rain loss: .0 dB

Urban loss: .0 dB

Foliage loss: .0 dB

B. W. St. Clair
Engineering Consultant

2355 Ranch Drive
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303-465-5742

Path Profile

MARCH 27, 1994

Figure 1

Federal Communications Commission

Mass Media Bureau

Audio Services Division

BROADCAST STATION TOTALS

AS OF August 31, 1996

The Commission has announced the following totals for broadcast stations licensed as of August 31, 1996:

AM RADIO	4873
FM RADIO	5371
FM EDUCATIONAL	1844
TOTAL	12088
UHF COMMERCIAL TV	627
VHF COMMERCIAL TV	559
UHF EDUCATIONAL TV	241
VHF EDUCATIONAL TV	123
TOTAL	1550
FM TRANSLATORS & BOOSTERS	2663
UHF TRANSLATORS	2646
VHF TRANSLATORS	2280
TOTAL	7589
UHF LOW POWER TV	1366
VHF LOW POWER TV	555
TOTAL	1921

-FCC-

Last updated September 5, 1996

If you have any suggestions about this page please,
send your comments to William Ball, wball@fcc.gov or Dale Bickel, dbickel@fcc.gov

EXHIBIT THREE